

24 Q. Who is responsible now for the listing issues?

25 A. Kathy Korona was working on it at the time.
0108

1 It's going straight -- it's been escalated, and it's high
2 in Pacific Bell.

3 Q. And the backlog was Victoria Flood, I think you
4 told me earlier?

5 A. Debby was working with some of the backlog,
6 Debby Nightingale at one time, but she was working with
7 people at the LISC. And that's all I know about that.

8 Q. Are there other issues that were -- dial tone
9 drops, for example, was that something that you keep as an
10 issue?

11 A. Well, it has improved. We are not having that
12 problem like we used to.

13 Q. When an issue comes up, if last week MCI called
14 with a dial tone drop, what would you do then to address
15 it at this point?

16 MR. KOLTO-WININGER: I will object. It assumes
17 a fact not in evidence.

18 MR. McDONALD: I think the testimony has been
19 that it's still occurring, it just isn't as frequent.

20 MR. KOLTO-WININGER: Ask her about her
21 experience.

22 MR. McDONALD: Q. When was the last time you
23 received a call from MCI as to a dial tone drop?

24 A. There was some problems last week. But after
25 researching the problem, MCI had given us the wrong

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1 address, the customer had moved, and so the dial tone was
2 there but it was at his old address. So I would say that
3 was the last time that I know personally.

4 Q. But when the dial tone issue comes up, what do
5 you do to address? Do you do research yourself? Do you
6 contact somebody at the LISC?

7 A. They would escalate that to the LISC.

8 Q. That means then who -- is it a particular
9 individual there?

10 A. Victoria Flood.

11 Q. I thought you said earlier dial tone drop you
12 consider pretty serious.

13 A. Very serious.

14 Q. That's an escalation issue?

15 A. But it would be escalated to the LISC to get the
16 customer up and working ASAP. I can't personally write
17 the order to do that. I would research it after the fact
18 sometimes.

19 Q. The CSR's, that information contained in the
20 system, that's available on line to a CLC?

21 A. No, it is not.

22 Q. Is it in a system that is on line to Pacific
23 Bell?

24 A. It's our billing system, yes.

25 Q. Pacific's customer service representatives have
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1 access to the CSR database?

2 A. Correct.

3 Q. Do you know if there is any kind of written

4 procedure for providing the CSR's to CLC's?

5 A. I believe it's in the CLC handbook.

6 Q. Are you aware of information being blacked out

7 on CSR's that are supplied to MCI?

8 A. Yes, I am.

9 Q. What information is that?

10 A. The PIC, I believe.

11 Q. Can you explain what the PIC is?

12 A. That's the long distance carrier. I would say

13 that's been escalated to the SEC levels.

14 Q. Do you know who physically is eliminating that

15 information?

16 A. With a pen? A rep, I believe.

17 Q. Who made the decision to do that, do you know?

18 A. No, I don't.

19 Q. Were you involved in any discussions about that?

20 A. Yes, I was.

21 Q. Who did you discuss it with?

22 A. I have discussed it with Mike Galligan. It's

23 gone to our legal department, and it's been escalated to a

24 very high level. And I believe it's with the FCC. It's

25 not a Pacific Bell decision, I don't believe.

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1 Q. What was the discussion you had regarding

2 blacking out the CSR information?

3 MR. KOLTO-WININGER: If you know something that

4 was discussed with legal, don't disclose that.

5 THE WITNESS: Okay.

6 Can you say that question? Sorry.

7 MR. McDONALD: Q. I think you said you were
8 involved with some discussions with Mike Galligan, was it,
9 and others?

10 A. Yes. I was also involved with David Williams,
11 MCI, regarding that we were blocking out that and that it
12 was a required field on the form to put the PIC in there,
13 and they wanted to receive that information.

14 Q. MCI wanted to receive the information but
15 Pacific decided not to give it?

16 A. No, it's not in Pacific that's decided.

17 Q. Pacific wasn't giving --

18 A. We are not allowed to, is what I am being told,
19 because it's proprietary information to the long distance
20 carrier, not the customer. I don't understand.

21 Q. I think you mentioned, is it Mike Galligan, is
22 that his name?

23 A. Yes.

24 Q. You mentioned him as being somebody -- he was a
25 products person?

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1 A. Correct.

2 Q. Can you describe what that -- what you meant by
3 that?

4 A. He is involved with products for resale and he
5 also helps the RMC's to kind of figure out if something is
6 processed versus product and who to kind of go to on

7 certain things.

8 Q. What's a product? Can you give me an example?

9 A. Call waiting is a product. It's a feature, but
10 it's still under products. A business line is a product.

11 Q. What's a process?

12 A. What's put in place to give the CLC that
13 information, say. How we are going to give you the CSR is
14 the process. The CSR could be a product. That's a sticky
15 one. That's why I went to Michael, to see if it was a
16 product-process issue, what was going on.

17 Q. Of the people that you go to in resolving – I
18 think you first mentioned when we talked about the RMC's
19 issue document, I have the impression it's a long list of
20 issues as they come up that are resolved; is that a fair
21 statement?

22 A. Correct.

23 Q. You identified him as being somebody who you go
24 to sometimes with some of these issues?

25 A. Correct.

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1 Q. Do you ever go to a person who deals with your
2 systems, computer programmer, anybody like that?

3 A. Regarding what?

4 Q. Regarding these RMC issues.

5 A. Possibly. I guess I don't understand.

6 Q. You identified Mike Galligan as being a products
7 person, and you said he is one of the people you go to in
8 the course of trying to resolve the variety of issues that

9 have arisen in your dealings with CLC's. These issues are
10 recorded on this document, right?

11 A. Yeah.

12 Q. Who else do you talk to? He is a product
13 person. Do you talk to a systems person, a computer
14 programmer, somebody like that?

15 A. Me, personally, no, I don't.

16 Q. Does anybody else who put together the RMC issue
17 document? They talk to somebody --

18 A. They may. Are you talking about NDM system?

19 Q. You tell me.

20 A. Yes, I have worked with people for MCI regarding
21 NDM systems people.

22 Q. Is that the extent that you have worked with
23 systems people to try to configure, I assume, the systems
24 in a way that will make this process work?

25 A. No.

0114

1 Q. Who else have you worked with?

2 A. I worked with people doing INER, I-N-E-R, I
3 don't know what it stands for. If MCI would like
4 something we do not provide right now, they have to fill
5 out this INER request, that has to do with systems
6 usually.

7 Q. Is that a form that you have and you provide to
8 MCI?

9 A. It's in the CLC handbook.

10 Q. Has MCI submitted such a request?

11 A. Yes, they have.

12 Q. Do you know how many?

13 A. I believe two or three.

14 Q. Do you know what's been done with them?

15 A. Yes.

16 Q. What's been done with them?

17 A. One was for -- to receive feature availability

18 information on either a disk or on download through MCI

19 Mail, and that's on a monthly basis. And PIC information

20 we will provide them, too, on disk or how they want it.

21 And the other one is for, I believe, something to go

22 through NDM, that information including the street address

23 guide through NDM. And that's been responded to and they

24 had a conference call last week regarding this issue.

25 Q. Is that the extent to which you have worked with
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1 systems people in addressing issues that have come up in

2 connection with the resale MCI issues that have been

3 raised with you?

4 A. Mostly it's been with NDM or if it's something

5 that they want.

6 Q. But there hasn't been an effort to -- you have

7 not worked on altering some of the other systems you told

8 us about?

9 A. I personally would not do that, no.

10 Q. Have you worked with any other process people

11 within Pacific Bell regarding resale issues you have

12 worked on?

13 A. Yes.

14 Q. Can you identify who they are and what those

15 process issues were?

16 A. Process issues?

17 Q. Yeah.

18 A. So we changed the question, okay. Penny Baxter

19 regarding super-trunk forms. Agnes Rome. I can go on and

20 on.

21 Q. That's because we are talking about process?

22 A. Exactly.

23 Q. If we go to talk about systems?

24 A. Me, personally?

25 Q. Right.

0116

1 A. I have not been involved. That doesn't mean

2 that Pacific Bell is not involved in them, I personally am

3 not.

4 Q. Are you knowledgeable about any efforts within

5 Pacific --

6 A. Yes.

7 Q. Let me finish the question.

8 A. I'm sorry.

9 Q. -- to work on these systems that we have talked

10 about in connection with resale, actually, the function?

11 MR. KOLTO-WININGER: I am not sure I understand

12 that.

13 MR. McDONALD: Q. To modify those systems for

14 the resale function?

15 A. Yes.

16 Q. Can you describe those to me?

17 A. No.

18 Q. Because?

19 A. I am not involved in them.

20 Q. So you know that it's happening, but you don't

21 know enough about them to describe them?

22 A. Exactly.

23 Q. What do you know about what's being done?

24 A. I know that I don't know if this is -- I mean, I

25 know that people are working to make things more
0117

1 mechanized for the CLC's and Pacific Bell. The ideal way

2 would be total mechanization. We want that, too.

3 Q. And you understand currently it's not a

4 mechanized system, there is a lot of human intervention?

5 A. And on MCI's part, both of ours.

6 Q. So it's your understanding that the system is

7 being worked on to make it more mechanized currently?

8 A. Yes, I believe so.

9 Q. But you have not been involved -- you have not

10 been involved in the work being done to alter those

11 systems; is that correct?

12 A. Only with NDM.

13 Q. Regarding notices of completion, is it your

14 understanding that Pacific is to provide MCI with a notice

15 of completion after the migrations occur; is that right?

16 A. Yes.

19 Nightingale the likely person to be responsible for this?

20 A. No. She is, again, on the account team.

21 Q. Right. So there is no single individual who is
22 responsible --

23 A. I don't know that.

24 Q. -- to work on the order completion issue?

25 A. I don't know.

0119

1 Q. As far as you know, it's still an outstanding
2 issue?

3 A. Yes.

4 Q. Are you aware of any written instructions
5 regarding procedures for issuing the completion notice?

6 A. No.

7 Q. Is there a system that generates the completion
8 notices?

9 A. Again, it's different depending on how the
10 orders are sent, I believe.

11 Q. If it's a faxed order?

12 A. I believe it would go through the LTD-CESAR
13 thing and then we'd fax it over to them. And if it's NDM,
14 it goes NDM, I believe.

15 Q. Who's the person most familiar, to your
16 knowledge, with how those two systems work?

17 A. I'm sorry, LTD and CESAR or NDM?

18 Q. LTD-CESAR, one, NDM, the other.

19 A. I would think the person that designed those,
20 the LTD.

21 Q. In terms of the operations of it currently, is
22 someone at the LISC going to be most knowledgeable?

23 A. I don't know who would be the most
24 knowledgeable.

25 Q. When an order is completed, do you know what the
0120

1 process is to have the completion notice issued, for
2 example, how much time passes between the actual physical
3 completion and the time that the system is updated to
4 reflect that?

5 A. I don't know.

6 Q. And do you know how much time passes between the
7 time of the update of the system to the time that the
8 actual notice is issued to the CLC?

9 A. No.

10 Q. Do you know who would know that?

11 A. I think that would vary. I don't know, I don't
12 know who would know that.

13 Q. We talked about the backlog earlier and you said
14 there was -- you didn't know, I don't think, of any
15 particular record that was in existence that would tell us
16 at any particular date what the backlog was; is that
17 right? Maybe my memory is wrong.

18 A. I don't know that there is any document like
19 that.

20 Q. There have been two different tracking systems,
21 is that right, in place?

22 A. There was a tracking system in the very

23 beginning that's no longer there. Now there's LTD and

24 CESAR and there's also the NDM thing there.

25 Q. But based on your knowledge of working with MCI,
0121

1 are you aware that the backlog grew a fairly sizable

2 amount and dropped off when it was worked off last year

3 and has grown again? Is that a fair description of what's

4 happened?

5 A. Yes.

6 Q. Currently, is there a pretty sizable backlog?

7 A. I don't know.

8 Q. You are not aware of what the current backlog

9 is?

10 A. No, I am not.

11 Q. Do you know how high the backlog was at its

12 highest point last year?

13 A. No.

14 Q. Do you know what number the backlog was worked

15 down to at its lowest point?

16 A. At one point I was told there was no backlog.

17 Q. Do you know when that occurred?

18 A. I don't remember.

19 Q. Was it before the end of the year, do you think

20 or --

21 A. I believe so. It was a while ago.

22 Q. Sometime in 1996?

23 A. I believe so.

24 Q. Do you know if Pacific agreed to provide MCI

25 with listing information for each customer that migrated?
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1 A. On the order, no.

2 Q. Let me make sure I understand what you mean by
3 on the order. You mean in the order coming in itself?

4 A. On the completion, no.

5 Q. So Pacific -- so if a customer migrates, Pacific
6 has not agreed to make sure that that customer maintains a
7 listing?

8 A. Yes, we want them to stay listed.

9 Q. Is there some written procedure for insuring
10 that listing is maintained for migration?

11 A. I have escalated this whole thing to my boss, so
12 I am not sure of exactly what's going on with it now and
13 they are investigating everything.

14 Q. Do you know what system within Pac Bell contains
15 the listing information?

16 A. The Gateway system --

17 Q. Gateway?

18 A. -- I believe it's called.

19 Q. Do you know if that system is available on line
20 to MCI?

21 A. Yes, it is.

22 Q. Has MCI talked to you about using it?

23 A. No, they did not want to do the listings. They
24 wanted us to do the listings for us. They can put their
25 own listings in if they preferred. They can do them

0123

1 themselves through Cleo -- excuse me, through L-I-O,

2 office.

3 MR. KOLTO-WININGER: It's not Cleo?

4 THE WITNESS: No.

5 MR. McDONALD: Q. We already talked about the
6 411 database drops. You are not aware of why it happens,
7 are you?

8 A. No.

9 Q. And as far as you know, that's an issue that's
10 being worked on?

11 A. Yes, it's being worked on.

12 Q. Who at Pacific would know the most about that,
13 do you know?

14 A. I have escalated. I don't know.

15 Q. Who have you escalated it to?

16 A. The listings? Kathy Korona has been involved in
17 it, and I believe Debby Nightingale. It has gone to very
18 high levels.

19 Q. When a problem is currently identified, do you
20 have a procedure in place to try to correct it when the
21 listing --

22 A. Yes.

23 Q. What's that procedure?

24 A. Now MCI calls Victoria Flood directly.

25 Q. And so it's addressed at the LISC?
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1 A. Correct. That's what I was last told as of last
2 Friday, I believe.

3 Q. Regarding lost dial tone, does Pacific advise

4 MCI when dial tone has been restored?

5 A. I believe so.

6 Q. Who would do that?

7 A. That would depend.

8 Q. What would it depend on?

9 A. No dial tone, there could be a storm problem and

10 there would be no dial tone, it would go to repair. After

11 the due date or on, it goes to repair. Before then, it

12 would be the LISC.

13 Q. Who contacts MCI to apprise them that the

14 customer's dial tone has been restored?

15 A. ISC, Interexchange Service Center. It's a

16 repair program for all --

17 Q. Do you know if they have a procedure to apprise

18 MCI or other CLC's the dial tone has been restored?

19 A. Yes, I believe they do, but all the maintenance

20 issues have gone over to Rudy Zaragoza, so I was no longer

21 involved. And in the meantime, I believe it's gone on to

22 Gary Niduaza on the account. So he's involved in the

23 maintenance, which I don't think I said earlier.

24 Q. Do you know how long, what kind of interval

25 occurs between the time the dial tone has been restored
0125

1 and the time when MCI has been apprised that it's been

2 restored?

3 A. No, I do not.

4 Q. Do you know if the procedure calls for a

5 particular time period?

6 A. No, I do not know.

7 Q. And, likewise, for the service features, is
8 there a procedure in place that apprises MCI when those
9 features have been restored?

10 A. I do not know.

11 Q. Who would know that?

12 A. I don't know.

13 Q. Someone at the LISC or --

14 A. I don't know the process.

15 Q. Are you aware of a problem involving a bill
16 notice going out when a customer asked to be migrated,
17 that the customer receives a notice from Pacific advising
18 them that their long distance services are being
19 terminated?

20 A. Yes.

21 Q. When did you hear about that problem?

22 A. Quite a while ago.

23 Q. September, October?

24 A. I'd say so, maybe October.

25 Q. And what did you do when you heard about that
0126
1 problem?

2 A. I escalated that.

3 Q. To whom did you escalate it?

4 A. Michael Galligan, Mark Chamberlin, they have
5 worked to reword the bill.

6 Q. Has that been done?

7 A. I believe so. They are working on it, at least,

8 I know that.

9 Q. Are there other issues that MCI has identified
10 to you that we haven't talked about? We talked about, for
11 example, a notice of termination of long distance
12 services, one that we hadn't talked about earlier.

13 Are there other types of issues, problems that
14 were identified to you by MCI that we have not yet talked
15 about?

16 A. That's a possibility.

17 Q. Do you know what they are?

18 A. There is a lot of issues, a lot, so I wouldn't
19 know every one of them, no.

20 Q. Are there any that occur to you, now as we are
21 sitting here, that we have not talked about?

22 A. Yes. One, the bill, when you mentioned the
23 bill, there was a problem, too, with a Pacific Bell number
24 being printed on there, so that when the customer calls
25 about their final bill, it refers them to the carriers,
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1 and that's being worked on, too. I escalated that
2 immediately, too.

3 Q. When did that first come up?

4 A. That was quite a few weeks ago. I don't know
5 the exact time.

6 Q. Who has that issue been escalated to?

7 A. I believe her name is Anita Bruer, but I could
8 be wrong. I just know she is in charge of that, a person
9 by kind of like that name. I have the records in my voice

10 mailbox.

11 Q. On the loss of dial tone, are you aware of
12 instances where MCI was shuttled back and forth between
13 the ISC and the LISC based upon which day the loss of dial
14 tone occurred?

15 A. Yes.

16 Q. Has that been resolved?

17 A. Yes, it has.

18 Q. What's the resolution of that?

19 A. Repair. The last I had heard, repair would
20 handle any loss of dial tone after hours so that MCI would
21 never have to wait for a customer if -- because we weren't
22 open in the LISC, and on the day of the due date or after
23 the due date, it would be a repair problem. Before that
24 it would be a LISC problem.

25 Q. But, previously, if the loss of dial tone had
0128 occurred prior to the due date, MCI had to contact the

2 LISC; is that right?

3 A. They would still contact the LISC.

4 Q. Okay. But --

5 A. I believe.

6 Q. But if it was after hours, and the LISC wasn't
7 open, that problem couldn't be addressed previously; is
8 that right?

9 A. No. They could call repair because if there
10 was -- I am confused.

11 Q. Describe for me what the problem was.

12 A. Okay. It didn't have to do necessarily -- if a
13 customer somehow lost dial tone due to a migration
14 situation or a -- they would call repair the day of the
15 due date or after the due date, okay. Then we made an
16 arrangement to make sure that MCI -- to make sure that
17 they could get this customer up and working. And that's
18 why they would go through the repair channels.

19 If it was late at night, before the due date,
20 they could go to repair and it would be our internal thing
21 to fix it paper-wise. When an order would need to be
22 written or if it was a storm problem, it doesn't
23 necessarily mean -- I lost a dial tone at my house, I
24 haven't migrated, so I had to call repair that weekend.

25 Q. Are you also aware of complaints that have been
0129

1 raised as to delays in migrated customers obtaining
2 repairs?

3 A. Yes.

4 Q. When did you first hear of that?

5 A. This is a long time ago. I was not involved in
6 it, and it's been escalated to a very, very high level.

7 Q. Do you know who is currently addressing that
8 issue?

9 A. I just know it's executive levels. Any customer
10 complaints I would give to Debby Nightingale and she does
11 something with it at a very high level.

12 Q. Do you know what system is in place to
13 communicate with MCI as to the status of repairs that are

14 being performed by the ISC?

15 A. Pardon me?

16 Q. Do you know what procedures are in place to
17 communicate with MCI regarding repairs that are being
18 performed by the ISC?

19 A. No, I do not.

20 Q. Do you know who would know that?

21 A. I believe it would be Sam Tennerilli,

22 T-e-n-n-e-r-i-l-l-i, maybe.

23 Q. What's his position?

24 A. He is like the director of repair and
25 maintenance -- repair and installation, I mean.
0130

1 Q. Is there anybody at the LISC who is a liaison to
2 deal with the ISC?

3 A. I don't know.

4 Q. Do you know of any -- what procedures are for
5 escalating repair work?

6 A. I no longer handle the maintenance issues. That
7 is given to somebody else on the account team who has
8 worked directly with Sam Tennerilli and people at MCI and
9 their maintenance department.

10 Q. Who is handling that now?

11 A. At one time it was given to Rudy Zaragoza on the
12 account team. And then it's going to be -- I believe it's
13 going to be passed on to Gary Niduaza, and Sam Tennerilli
14 is the director who they have met with and had conference
15 calls with MCI.

16 Q. Are you aware of statements by Pacific Bell
17 representatives to customers regarding MCI or other CLC's
18 ability to provide services? Has that been an issue
19 that's been raised?

20 A. I think this is back to that same issue. It's
21 at a very high executive level that anything I would get
22 like that would be taken immediately to Debby Nightingale
23 and worked at a very high level.

24 Q. So you did hear some complaints along those
25 lines?

0131

1 A. Yes.

2 Q. Do you remember when you first heard those?

3 A. No, I do not.

4 Q. Do you know if it was 1996 or 1997?

5 A. I believe it was 1996.

6 Q. And did you pass those on to Debby Nightingale?

7 A. There were ones before that had gone to very
8 high levels, and then I was told recently anything would
9 go straight to Debby Nightingale, that she'd pass it on to
10 a high level. I don't believe I have had any since that
11 time that I needed to pass on to Debby Nightingale.

12 Q. To your knowledge, has this been resolved?

13 A. I have not heard any more about this right now.

14 I am not in that loop.

15 Q. You also heard about complaints about
16 accelerated billing for customers migrating away from
17 Pacific Bell?

18 A. No, I have not.

19 Q. Customers receiving notices that their accounts
20 have been sent to collection upon migration?

21 A. No, I did not.

22 Q. Are you aware of the procedure Pacific used,
23 say, in the first -- until January of this year, say, to
24 win back migrating customers?

25 A. No, I am not.

0132

1 Q. Who would know about that?

2 A. I don't know.

3 Q. Did you ever hear complaints about that?

4 A. Yes, I did.

5 Q. When did you first hear those?

6 A. I don't remember.

7 Q. Have you heard ongoing complaints?

8 A. Not recently. This was, again, one of the
9 things that were taken very seriously at Pacific Bell and
10 goes straight to a very high level. And I would not have
11 been involved in that. I was in the very beginning.

12 Q. So that was an issue that you passed on to a
13 superior and you haven't been involved since then?

14 A. I believe so, yes.

15 Q. Were you aware that Pacific was able to contact
16 customers in an attempt to win them back even before MCI
17 received notice that the customer had migrated?

18 A. I just heard things, that there was a problem
19 and it was being addressed at a very high level. I don't

20 know the details.

21 Q. Had you heard that statement?

22 A. That exact thing, no.

23 MR. McDONALD: We will take a break.

24 (Recess taken.)

25 EXAMINATION BY MS. LEE

0133

1 MS. LEE: Q. So you mentioned a couple of

2 computers -- I guess they are programs, and they had

3 acronyms such as SORD, BOSS, PREMIS and Cleo. And I just

4 want to ask you what they are used for. And if you don't

5 know what they are used for in the LISC, I'd like you to

6 answer what they are used for based on your business

7 market experience.

8 So with the first one you had one called

9 S-O-R-D, SORD; what is that generally used for at Pac

10 Bell?

11 A. It is used for typing service orders and pulling

12 up customer records.

13 Q. What kind of service orders?

14 A. Business service orders, residence service

15 orders, any kind of service orders.

16 Q. Would that be like, you know, a new service,

17 start-line service?

18 A. Yes.

19 Q. Are all the customer records of existing Pac

20 Bell customer records services within SORD?

21 A. Yes.

22 Q. Do you know if the LISC types migration orders
23 into SORD?

24 A. I am not sure of that. I believe so, but I am a
25 little confused about that process.

0134

1 Q. And then there was another one called BOSS,
2 B-O-S-S. And what is that used for in Pac Bell?

3 A. Billing a customer.

4 Q. Is it tied to SORD?

5 A. I believe it is somehow, yes.

6 Q. So would you think that the information that's
7 in SORD about the customer services gets pulled into BOSS
8 and then a bill gets rendered by BOSS?

9 MR. KOLTO-WININGER: Do you know, do you know?

10 THE WITNESS: I don't know that for sure, no.

11 MS. LEE: Q. I think you said that the LISC
12 pulls the CSR's from BOSS?

13 A. I believe so, yes, that's where -- customer
14 service records are in BOSS.

15 Q. Are customer service records different from the
16 service orders that are in SORD?

17 A. Yes.

18 Q. How are they different?

19 A. SORD only is -- SORD, USEC, U-S-E-C, capital
20 letters, for math, and BOSS is English, and I believe it
21 can be in USEC, too.

22 Q. Did you say that MCI has on-line access to Cleo?

23 A. Okay. I don't know if it's on-line. They have

24 on-line access to CESAR right now. Cleo is a subset of

25 CESAR, so if they wanted to have it on-line, they just
0135

1 need to get a password for it. Right now they dial into

2 it, I believe.

3 Q. What would MCI want to use Cleo for?

4 MR. KOLTO-WININGER: If you know.

5 MS. LEE: If you know.

6 THE WITNESS: Why would they want to?

7 MS. LEE: Q. Yeah.

8 A. To verify street addresses. They could assign a

9 telephone number themselves instead of having to call

10 LISC. They could check feature availability per central

11 office, and PIC information per central office.

12 Q. When you say they could assign telephone numbers

13 to themselves, does that mean new telephone numbers, say,

14 for a new customer?

15 A. Yes.

16 Q. So that MCI wouldn't have to call in to any kind

17 of number reservation area, they could just dial into

18 Cleo?

19 A. For certain numbers you would not be able to do

20 that. Like I believe it's not for like Centrex or trunks,

21 just the way our reps can do that, too.

22 Q. P-O-T-S orders, POTS orders.

23 A. Major business, residences, basic exchange with

24 features.

25 Q. Do you have access to any of these computer